

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
	)	
Mary Catherine Klee,	)	Bankruptcy No. 15-20332-TPA
	)	
Debtor.	)	Chapter 7
*****	)	
Select Portfolio Servicing, Inc.,	)	Doc No.
	)	
Movant,	)	
vs.	)	
	)	
Mary Catherine Klee, Debtor/Respondent,	)	
	)	
and	)	
	)	
Natalie Lutz Cardello, Trustee/Respondent,	)	

**REPLY TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND REQUEST  
FROM WAIVER OF FED.BANKR. P. 4001(a)(3) STAY**

NOW COMES, the Debtor, Mary Catherine Klee, by and through her counsel, Lawrence E. Bolind, Jr., Esquire, and files the within Reply to Motion for Relief from the Automatic Stay and Request from Waiver of Fed.Bankr. P. 4001(a)(3) Stay upon the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in Part. Debtor's husband is a joint owner of the property secured by the mortgage.
7. Admitted.

8. Admitted.

9. Admitted.

10. Denied. Payments were made by the Debtor through the Chapter 13 Trustee. In addition, the Debtor's husband has contacted the Movant and has attempted to make continuing mortgage payments. It is strictly denied that the total amount averred as owed in the Motion is the correct. Further calculations will be required to determine the correct amount owed on the mortgage.

11. Admitted.

12. Admitted.

13. Admitted.

14. Admitted as to the Court determining whether an order is forthcoming. Denied that an Order should be granted based on the incorrect calculations used to determine the balance owed.

15. Denied that an Order should be granted based on the incorrect calculations used to determine the balance owed.

16. Denied that an Order should be granted based on the incorrect calculations used to determine the balance owed.

17. Denied. Additional calculations are required to determine the correct amount owed, or in the alternate, a hearing should be held to adjudicate the correct balance and to determine what rights the joint property owner has in these proceedings.

WHEREFORE, the Debtor respectfully requests this Honorable Court to dismiss the Movant's Motion for Relief from the Automatic Stay and Request from Waiver of Fed.Bankr. P. 4001(a)(3) Stay against the Debtor or any of her property located at 2508 Bonnie Dell Drive, South Park, PA 15129, and for any other additional relief as may be appropriate.

By: /s/ Lawrence E. Bolind, Jr.  
Lawrence E. Bolind, Jr., Esquire  
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